



Privacy Policy

Effective as of May 28, 2025

Newport Private Wealth Inc., its divisions, affiliates, funds and limited partnerships (“**Newport**”, “**we**”, “**our**”, “**us**”) are committed to ensuring that the collection, use, processing, and disclosure of personal information is performed in compliance with applicable data protection laws. The purpose of this privacy policy (the “**Policy**”) is to explain how and for what purposes we collect, use, share or otherwise process your personal information and how we safeguard the confidentiality of your personal information, whenever you interact with Newport or access Newport’s website www.newportprivatewealth.ca (the “**website**”), including when you create and access your online Newport client and referral account (“**Accounts**”).

Managing and protecting the collection, use, and disclosure of personal information is a continuous process. Newport will continually review and update its personal information management practices, and this privacy policy as needed to enhance the protection of individuals' privacy and to maintain compliance with applicable privacy laws.

This Policy does not apply to the personal information of employees of Newport.

Table of contents

1. Personal Information	2
2. Collection of Personal Information.....	2
3. Use of Personal Information.....	3
4. Disclosure of Personal Information	4
5. Consent and Your Right to Withdraw Consent.....	4
6. Access and Rectification	5
7. Retention of Personal Information	5
8. Minors.....	5
9. Safeguarding Personal Information	5
10. Cross-border Transfer of Personal Information	6
11. Changes to this Policy.....	6
12. Contact Us	6

1. Personal Information

In the Policy, “personal information” generally refers to any information—regardless of format—that can be used, either alone or in combination with other information, to identify an individual. This may include, for example, your name, contact details, mailing address, email address, transaction history and other information relating to your account with us, where applicable. It can also include certain technical information, but only if it can be used to identify you as an individual. Information that has been aggregated or anonymized and cannot be used alone or with other data to identify an individual, is not considered to be personal information.

2. Collection of Personal Information

Newport collects personal information from various sources for the purposes outlined in the [Use of Personal Information](#) section. Specifically, Newport collects personal information as described below:

Information Collected from You

Newport obtains most of the information it requires directly from you when you open your account with us - whether in person, by telephone or electronically (e.g., by email).

Information Collected from Third Parties

Newport may receive additional information, including creditworthiness or credit history, from other financial institutions or service providers whom you may have authorized to provide us with such information and/or credit bureaus, verification services or references, or public sources.

Information Collected Automatically

We use cookies (small computer files that a website’s server places on your computer) and other technologies to automatically collect information about your online activity when you use our website. You can set your browser to reject cookies, but this may impair our ability to customize and test your experience, like remembering your preferred language or present location-specific information to you.

We use the following types of cookies on our website:

- **Strictly necessary cookies:** essential to allow you to fully use our website and all its features. These cookies cannot be turned off as they are essential for enabling the basic functionalities of the website, and do not gather information about you that could be used for marketing.
- **Functional cookies:** help perform certain functionalities such as sharing the content of the website on social media platforms, collecting feedback, and other third-party features. They allow the website to remember your language preferences.
- **Analytics cookies:** used to understand how visitors interact with the website. They help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.
- **Advertising cookies:** used to provide visitors with customized advertisements based on the pages you visited previously and to analyze the effectiveness of the ad campaigns.

Categories of Personal Information Collected

Newport collects, uses and stores the following categories of information in connection with providing you with its services.

- **Identity Data**, such as your name, date of birth, marital status, Social Insurance Number (SIN), and other data on government-issued identification documents.
- **Contact Data**, such as your email address, mailing address, and telephone number.
- **Financial Data**, such as your bank account details, and information about your income, account balances, financial transaction history, credit history, investment history, tax information, and credit scores.
- **Profile Data**, such as your username and password information that you use to create and access your Accounts on our website, preferences, and feedback.
- **Online Data**, such as information from your online activity; for example, information about your web browser, time zone, Internet Protocol (IP) address, mobile network information, website use, links clicked, time spent on our website, pages viewed, and conversion information.

3. Use of Personal Information

Newport uses your personal information to provide you with our wealth management services, as described under [Collection of Personal Information](#) above. For example, this includes assessing your eligibility to invest with us and establishing and administering your account.

We may also use your personal information for the following purposes, or otherwise with your consent or as permitted or required by law:

- **To verify your identity**, as required by statutory and regulatory requirements when you open an account with us and to allow you to access your Accounts (e.g., by entering your username and password);
- **To provide or deliver our products and services**, including to establish and administer your account, ensure our records are accurate, determine your eligibility for products and services, execute your transactions, provide you with account statements, reports, tax receipts, proxy mailings, transaction confirmations, and to maintain, store, record and determine your account holdings and transaction records.
- **To manage our business operations**, including managing and facilitating the use of our website and your Accounts (including through cookies and similar technology), ensuring the security of our website and your Accounts, and detecting fraudulent activity.
- To enhance and expand our product and service offerings, respond to your inquiries or feedback, and provide customer service and support related to your investment needs. **To comply with legal requirements**, including but not limited to record-keeping, reporting and tax obligations.

4. Disclosure of Personal Information

Newport may, in the circumstances described below and from time to time, disclose your personal information to regulatory agencies, companies affiliated with Newport, and other third parties to perform services on behalf of Newport for the purposes explained in the [Use of Personal Information](#) section of this Policy and as permitted or required by law:

- **Among Newport's entities.** Newport and its entities, for example, its affiliates, may share personal information among themselves and use it for the purposes described in this Policy. This allows each entity to comply with applicable laws, regulations and requirements, and ensures that your information is consistent, accurate and up to date. In addition, it increases the quality and relevance of the services you receive and improves your interactions with Newport through easier access to your information within the group.
- **Services providers.** Newport transfers personal information to third parties for reasons such as transaction clearing, regulatory reporting, credit checks, data processing, data warehousing or administrative services such as providing monthly statements and asset custody. These third parties provide services to Newport and do not make any independent use of the personal information provided by Newport. Newport uses contractual or other means to ensure that any third parties it engages in the manner stated herein adhere to Newport's Privacy Policy and related procedures.
- **Business transactions.** In the event of a sale, amalgamation, re-organization, transfer or financing of parts of some or all of our business, your personal information may be disclosed to an acquiring organization, either as part of due diligence and/or on completion of the transaction. If your personal information is ever disclosed to an unaffiliated third party in this context, Newport will require that the third party agree to protect your personal information in accordance with this Policy and applicable law.
- **To comply with our legal obligations.** From time to time, Newport may be compelled to disclose personal information in response to a law, regulation (e.g., for tax purposes to the Canada Revenue Agency), court order, subpoena, valid demand, search warrant, government investigation or other legally valid request or inquiry. Such requests will generally be submitted to Newport for purposes of surveillance of trading-related activity, for investigation purposes relating to sales, financial compliance, trade desk review, and other regulatory audits, to update regulatory databases, and to enforce disciplinary proceedings. We may also share personal information with law enforcement agencies where we are made aware of any activity that we believe to be unlawful, or in the case of an emergency that threatens the life, health or safety of a person.

5. Consent and Your Right to Withdraw Consent

Consent requests. Newport will seek consent for the collection, use and disclosure of your personal information prior to or at the time of account opening and at any other time further personal information is collected from you, unless otherwise permitted under applicable laws.

In some instances, legal or security reasons may make it impossible or impractical for Newport to seek consent. For example, when information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information.

Withdrawing your consent. You may withdraw your consent to our collection, use and sharing of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide you with certain services. To withdraw your consent, please communicate with us as set out under [Contact Us](#).

6. Access and Rectification

You are entitled to access your personal information and request the rectification of information that is inaccurate, incomplete or no longer up to date, subject to limited exceptions set out in applicable laws. To exercise your rights, please contact us using the information provide in the [Contact Us](#) section below. Please be advised that in order for you to modify, access or review your personal information, we may ask you to provide us with sufficient identification.

7. Retention of Personal Information

Newport will only retain personal information as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise authorized or required by law. For example, Newport is subject to legislative requirements with respect to information retention periods. Following expiry of legal retention periods, Newport will destroy, erase or anonymize personal information that is no longer required to fulfill the identified purposes. Newport has developed guidelines to govern the destruction of personal information.

8. Minors

We do not knowingly solicit or collect personal information from children under the age of 14. If we learn that a child under the age of 14 has provided us with personal information without the verifiable consent of a parent or legal guardian, we will take reasonable steps to delete that information.

9. Safeguarding Personal Information

Newport has developed security safeguards to try to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification of personal information, regardless of the format in which the information is held. These methods of protection include:

- physical measures (e.g., locked filing cabinets and restricted access to offices).
- organizational measures (e.g., security clearances and limiting access on a “need-to-know” basis); and
- technological measures (e.g., the use of passwords and encryption).

Newport has also implemented governance policies and practices that give effect to the principles and procedures in this Policy and ensure the protection of your personal information, as required by laws. These policies and practices provide a framework applicable to the keeping and destruction of personal information, outline the roles and responsibilities of our employees throughout the life cycle of the information, establish a process for dealing with complaints regarding the protection of the information. Moreover, Newport trains its employees to ensure the adequate implementation of these data protection and practices.

10. Cross-border Transfer of Personal Information

Some of our external third-party service providers are based outside of Quebec and outside of Canada, [including in the United States], and their processing of your personal information will therefore involve a transfer of information outside of Quebec and outside of Canada. Organizations based outside of Canada may not be subject to privacy laws that provide you with the same rights and protections as in Canada. As a result, when your personal information is used or stored in a jurisdiction other than where you are residing, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

11. Changes to this Policy

We may review and update this Policy as required to keep current with rules and regulations, new technologies and standards. Our Policy may therefore change from time to time. We will post any changes on our website and, if the changes are significant, we will provide a more prominent notice where required by law. This Policy is effective as of the date which appears at the top of this page.

12. Contact Us

If you have any questions or concerns about this Policy or about your personal information that has been collected by Newport or if you wish to exercise your individual privacy rights, please contact Newport's Privacy Compliance Officer using the following information:

Privacy Compliance Officer

Newport Private Wealth Inc.

469 King Street West, 4th Floor, Toronto, ON M5V 1K4

416-867-8579 or to privacy@newportprivatewealth.ca

Newport monitors compliance with this Policy on an ongoing basis.